

## REMARKS

Claims 1-27 remain in this application. The specification and the claims have been amended as set forth above. The Applicant respectfully requests reconsideration of the present application and the allowance of claims 1-27.

Claims 1-27 were rejected under 35 U.S.C. § 103(a) as being unpatentable over a combination of the “admitted prior art” of Figure 3 of the present application and page 2, last paragraph of the present application, Furner et al. (U.S. Patent No. 5,974,474), and Fung et al. (U.S. Patent No. 6,301,011). The Applicant respectfully traverses this rejection based on the following remarks.

The Applicants respectfully submit that one of ordinary skill in the art would not have been motivated to combine the arrangement of Figure 3 of the present application, the description at page 2, last paragraph of the present application, the Furner et al. patent and the Fung et al. patent in the manner suggested by the Examiner, except in hindsight in view of the present application. Even if one of ordinary skill in the art were motivated to combine these teachings at the time of the present invention, the Applicant respectfully submits that one would not have been motivated to combine these teachings in a manner that would render obvious the claims of the present application. For example, the Examiner has asserted that Furner enables a plug and play system to select a better driver for optimized operations, and Fung enables adding a new output device without extensive revision of the system. One of ordinary skill in the art, if motivated to add the teachings of Furner to the system of FIG 3 of the present

application, would have added an interface/proxy to select drivers. There would have been no motivation to use this interface/proxy to use this interface/proxy to perform operations on any devices as specifically claimed in the present application. The Examiner has relied on the Fung patent to disclose a supervisory server 420 that delivers data to various output devices 500. However, the supervisory server does not interface with a device driver or OPRM as claimed in the present application.

In addition, none of the prior art relied upon by the Examiner, either alone or in any possible combination thereof, disclose or suggest the a resource access method(s) are called to perform a resource operation on a device in a manner such that an abstraction layer interface hides the resource access method(s) from the device driver or OPRM.

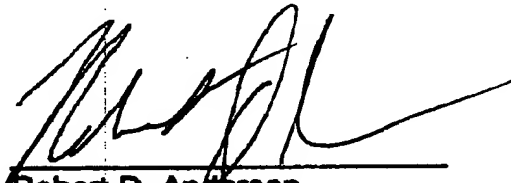
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The Applicants respectfully submit that the prior art relied upon by the Examiner does not disclose or suggest at least the features of the present invention as set forth above. In view of the foregoing, the application is considered to be in condition for allowance. Early notification of the same is earnestly solicited. If there are any questions regarding the present application, the Examiner is invited to contact the undersigned attorney at the telephone number listed below.

Respectfully submitted,

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Date



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